

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
BALTIMORE DIVISION

JASON ALFORD, DANIEL LOPER,
WILLIS McGAHEE, MICHAEL
McKENZIE, JAMIZE OLAWALE, ALEX
PARSONS, ERIC SMITH, CHARLES
SIMS, JOEY THOMAS, and LANCE
ZENO, Individually and on Behalf of All
Others Similarly Situated,

Case No. 1:23-cv-00358-JRR

Plaintiffs,

vs.

THE NFL PLAYER DISABILITY &
SURVIVOR BENEFIT PLAN, *et al.*,

Defendants.

**[PROPOSED] ORDER SEALING EXHIBITS
AND UNREDACTED MEMORANDUM**

Upon consideration of Plaintiffs' Motion to Seal ("Motion to Seal"), it is hereby
ORDERED that the Motion to Seal is **GRANTED**. Accordingly, it is further
ORDERED that (a) Exhibits H-Q to the Reply Declaration of Benjamin R. Barnett in
Further Support of Plaintiffs' Motion for Class Certification and in Support of Plaintiffs' Motion
to Exclude, dated April 11, 2025, shall be sealed in their entirety; and (b) the unredacted version
of the Memorandum of Law in Support of Plaintiffs' Motion to Exclude and Reply Memorandum
of Law in Further Support of Plaintiffs' Motion for Class Certification, dated April 11, 2025, shall
be sealed.

Dated: April ___, 2025

JULIE R. RUBIN
United States District Judge